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Action: ARM

Mr. Anthony J. Broderick
Associate Administrator for Regulations and Certification, (AVR-1)
Department of Transportation
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington DC 20591

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Dear Mr. Broderick:

**Subject: Recommendations of ARAC/Airworthiness Assurance
Working Group (AAWG) on Aircraft Corrosion Prevention
and Control Programs (CPCP)**

The AAWG is currently tasked to develop recommendations on whether new or revised requirements and compliance methods for corrosion prevention and control programs should be instituted and made mandatory for certain Airbus, British Aerospace, Boeing, McDonnell Douglas, Fokker and Lockheed aircraft. Since CPCP Airworthiness Directives have either been proposed or adopted for all of the affected aircraft, ARAC on Transport Aircraft and Engine Issues (ARAC) is recommending that this task be considered as complete.

We (ARAC) have been advised that the Flight Standards Service is developing a proposed FAR Part 121/125/129/135 rule which if adopted, would require that operators incorporate an FAA approved CPCP into their maintenance program within a specified time after the rule becomes effective. AAWG recommends endorsement of this rulemaking since it would provide Flight Standards with explicit regulatory authority to mandate comprehensive CPCPs among each of the operators. In the past AAWG had recommended that such programs be mandated by Airworthiness Directives in part, because it would have taken too long to adopt other rulemaking options. However, for in-production aircraft and particularly for newly produced and future aircraft the AAWG believes that AD's should not be used to mandate CPCP's. In order to ensure that comprehensive CPCPs continue to be developed for each of the various aircraft types, AAWG recognizes that the above proposed FAR Part 121/125/129/135/ rule would require companion Advisory Circulars and offers its expertise to assist in their development.

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AAWG is also recommending that current in production airplanes be removed from the existing CPCP AD's once a manufacturer has an initial CPCP in place for use by operators. This may be implemented by means of a separate document or integration into a MRB or MPD document. This recommendation is based upon the anticipated adoption of the above FAR Part 121 rule and upon the initial recommendations of AATF (AAWG) that it was never their intention to recommend that CPCP AD's continue to be made applicable for each of the then future produced (now currently produced) aircraft types.

ARAC TAEIG was also advised that the FAA was soliciting industry input on whether the existing Boeing CPCP AD's should be revised to conform to the format used for the McDonnell Douglas CPCP AD's. While it was acknowledged that the McDonnell Douglas AD's delegate more oversight authority to the PMI, the AAWG believes that the McDonnell Douglas AD's still fall short of totally integrating the CPCP into an operator's existing maintenance program. AAWG recommends that the McDonnell Douglas AD's be further revised to allow operators the opportunity of adjusting subsequent compliance intervals without prior FAA approval, provided the adjustment is substantiated in accordance with FAA approved operator reliability program practices. For operations which have obtained alternative means of compliance approvals, the Boeing CPCP's are now equivalent to McDonnell Douglas CPCP's. For such operators the proposed action to convert the Boeing AD's into the McDonnell Douglas CPCP format without meaningful change, only adds expense by requiring them to change paperwork with no added benefit.

In summary, ARAC TAEIG supports the following AAWG recommendations:

1. that the existing AAWG task on CPCP be removed from the active ARAC project list; and
2. that the project to propose FAR 121/125/129/135 rulemaking requiring operators to have a CPCP program for their fleet, be accelerated; and
3. that newly manufactured airplanes be removed from existing CPCP AD's once manufacturing documentation for implementation of a comprehensive CPCP for such aircraft, has been issued; and

4. that the McDonnell Douglas CPCP AD's be revised so that once the initial tasks are incorporated into an operators maintenance program, the operators are able to conduct their CPCP in accordance with current Flight Standards approval practices. Once implemented, the Boeing CPCP AD's should also be revised to confirm to the format of the revised McDonnell Douglas AD.

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The FAA response to these recommendations is appreciated.

Sincerely,

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cc: ARAC TAEIG Group Members
AAWG Chairman